

SUMMIT DEFENSE
A Professional Law Corporation
JAMES T. REILLY, Attorney at Law
California State Bar No. 67254
4040 Civic Center Drive, Suite 200
San Rafael, CA 94903

Phone: 510-412-8900
Cell: 415-913-0787
email: jim@summitdefense.com

Attorneys for Defendant RAY JOE GARCIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,	:	
	:	Case No. 4:21-cr-00429-YGR
Plaintiff,	:	
	:	DEFENDANT'S REQUEST FOR
vs.	:	PERMISSION TO BRING
	:	EQUIPMENT INTO THE
RAY J. GARCIA,	:	COURTHOUSE FOR TRIAL AND
	:	(PROPOSED) ORDER GRANTING
Defendant.	:	THE REQUEST

DEFENDANT RAY J. GARCIA, by and through counsel, and pursuant to Paragraph 19 of the Court's Pretrial Order No. 2 (Document 71). Defendant Ray Joe Garcia hereby requests that the court grant permission for him to bring equipment into the courthouse for trial. This request is based on the attached Declaration of Counsel.

Date: November 18, 2022

Respectfully submitted,



JAMES T. REILLY, Attorney at Law
Counsel for Defendant RAY J. GARCIA

DEFENDANT'S REQUEST FOR PERMISSION TO BRING
EQUIPMENT INTO THE COURTHOUSE FOR TRIAL
4:21-CR-00429-YGR

**DECLARATION OF COUNSEL IN SUPPORT OF
DEFENDANT'S REQUEST FOR PERMISSION TO BRING
EQUIPMENT INTO THE COURTHOUSE FOR TRIAL**

I, James T. Reilly, hereby declare under penalty of perjury that I am an attorney, duly licensed to practice law in the State of California, State Bar License No. 67254. I am counsel for the Defendant in this case, Ray Joe Garcia.

In the Court's Pretrial Order No. 2 (Document 71), the Court ordered that the "... parties must provide the Court with a form of order for (1) any equipment or supplies requested to be brought into the courthouse ..." for the trial of this matter.

The trial documents for this case are voluminous, currently consisting of more than 46,000 pages of discovery, 348 proposed exhibits, and numerous other documents. I anticipate that the materials needed by the defense during the trial will fill 16 or more 2½ inch looseleaf binders.

To facilitate bringing these binders into the courthouse and to provide easy access to them while court is in session, I propose to accomplish these purposes by using a library cart 26" long by 14" deep by 32" tall.

I therefore respectfully request that the court grant this Defendant's Request for Permission to Bring Equipment into the Courthouse.

Date: November 18, 2022

Respectfully submitted,



JAMES T. REILLY, Attorney at Law
Counsel for Defendant RAY J. GARCIA

**(PROPOSED) ORDER GRANTING
DEFENDANT'S REQUEST FOR PERMISSION TO BRING
EQUIPMENT INTO THE COURTHOUSE FOR TRIAL**

Defendant's Request for Permission to Bring Equipment Into the Courthouse for Trial having been considered by the court and good cause appearing therefore, permission is GRANTED and Defendant may bring into the courthouse the described library cart.

IT IS SO ORDERED.

Date: _____

**The Honorable Yvonne Gonzalez-Rogers
Judge, United States District Court
Northern District of California
Oakland Division**